

David A. Straite (*pro hac vice* pending)
DiCELLO LEVITT LLP
485 Lexington Ave., Suite 1001
New York, New York 10017
Tel.: (646) 933-1000
Fax: (646) 494-9648
dstraite@dicellolevitt.com

Brian O'Mara (Cal. Bar No. 229737)
DICELLO LEVITT LLP
4747 Executive Dr., Second Floor
San Diego, California 92121
Tel.: (619) 923-3939
bomara@dicellolevitt.com

Amy E. Keller (admitted *pro hac vice*)
Nada Djordjevic (admitted *pro hac vice*)
James A. Ulwick (admitted *pro hac vice*)
DICELLO LEVITT LLP
Ten North Dearborn Street, Sixth Floor
Chicago, Illinois 60602
Tel.: (312) 214-7900
akeller@dicellolevitt.com
ndjordjevic@dicellolevitt.com
julwick@dicellolevitt.com

Counsel for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GOV. MIKE HUCKABEE, THE RELEVATE GROUP, DAVID KINNAMAN, TSH OXENREIDER, LYSA TERKEURST, and JOHN BLASE, individually and on behalf of all others similarly situated,

Plaintiffs,

vs.

META PLATFORMS, INC., et al.

Defendants

Case No. No. 3:23-cv-06663-VC

NOTICE OF VOLUNTARY DISMISSAL OF PLAINTIFFS GOV. MIKE HUCKABEE, THE RELEVATE GROUP, DAVID KINNAMAN, TSH OXENREIDER and JOHN BLASE, WITHOUT PREJUDICE

FED. R. CIV. P. 41(a)(1)(A)(i)

PLEASE TAKE NOTICE that Plaintiffs **Gov. Mike Huckabee, the Relevate Group, David Kinnaman, Tsh Oxenreider, and John Blase** (the "Withdrawing Plaintiffs") hereby voluntarily dismiss their claims against defendant Meta Platforms, Inc. in the above-captioned action without prejudice.

1 This action was originally filed on October 17, 2023 in the United States District Court for
 2 the Southern District of New York (SDNY Case No. 1:23-cv-9152) against several defendants.
 3 Plaintiffs' claims against Meta were then severed and transferred to the Northern District of
 4 California on December 29, 2023 (Dkt. 70), and judicially related to *Kadrey, et al. v. Meta*
 5 *Platforms, Inc.*, 3:23-cv-03417-VC (Dkt. 95) on January 23, 2024. The Withdrawing Plaintiffs now
 6 voluntarily dismiss their claims against defendant Meta without prejudice and without fees or costs
 7 to any party, and reserving their rights as members of any class that may be certified in this litigation.
 8 In accordance with Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, no class has been
 9 certified or sought to have been certified, and no opposing party has served an answer or motion for
 10 summary judgment.

11 Follow the dismissal of the Withdrawing Plaintiffs, Plaintiff **Lysa TerKeurst** will be the
 12 sole remaining Plaintiff in the above-captioned action. She intends to formally move to consolidate
 13 this action with and into *Kadrey* (or alternatively file a stipulation of consolidation) this week, and
 14 if approved by the Court, this docket would then be closed.

15 DATED: June 18, 2024

Respectfully submitted,

DICELLO LEVITT LLP

By: /s/ David A. Straite
 David A. Straite (*pro hac vice* pending)
 485 Lexington Ave. Suite 1001
 New York, New York 10017
 Tel.: (646) 933-1000
 Fax: (646) 494-9648
dstraite@dicellolevitt.com

Amy E. Keller (*admitted pro hac vice*)
 Nada Djordjevic (*admitted pro hac vice*)
 James A. Ulwick (*admitted pro hac vice*)
 Ten North Dearborn Street, Sixth Floor
 Chicago, Illinois 60602
 Tel. (312) 214-7900
 Fax: (646) 494-9648
akeller@dicellolevitt.com
ndjordjevic@dicellolevitt.com
julwick@dicellolevitt.com

Brian O'Mara (Cal. Bar No. 229737)

DICELLO LEVITT LLP

4747 Executive Dr., Second Floor

San Diego, California 92121

Tel.: (619) 923-3939

bomara@dicellolevitt.com

Counsel for Plaintiffs and the Proposed Class

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2024, I caused to be electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

/s/ David A. Straite
David A. Straite (*pro hac vice* pending)
DiCELLO LEVITT LLP

Counsel for Plaintiffs and the Proposed Class